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BY: _____	DEPUTY _____

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The United States District Court
District Of Nevada

Gregory Hughes

Plaintiff,

vs.

Case No.

3:12-cv-00179

County of Washoe

ORIGINAL COMPLAINT

City of Reno,

City of Sparks,

Reno City Marshal Eric Ramos personally as well as in his official capacity

City of Reno Marshal Commander Justin Roper

Sue Edmondson Court Master Washoe County District Court

Defendant Tamatha Schreinert Court Master in Reno

Reno Justice Court Judge Patricia A. Lynch

Sparks Justice Court Judge Kevin Higgins

Sparks Police Officers yet to be identified

Sparks Police Chief Steve Keefer

And yet unnamed defendants A through I

Defendant.

ORIGINAL COMPLAINT

Complaint

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2 The plaintiff alleges and believes that the defendants have entered into actions that would make a
3 reasonable man feel vexed and harassed and cause severe emotional and financial harm. The
4 court and its officers, along with other defendants, have deprived the defendant of his constitutional
5 rights. The Reno City Marshal Eric Ramos has taken actions to falsely imprison, to extort and cause
6 bodily harm to the Plaintiff. The Defendants through their action entered into a pattern of actions
7 that caused the Plaintiff financial harm, physical harm, with held medical treatment and caused the
8 Plaintiff to live in an atmosphere of fear. The cumulative actions of the defendants caused mental
9 distress and severely harmed the plaintiff mentally, physically and financially. The court and its
10 officers have deprived the plaintiff of his constitutional rights as guaranteed in the First, Fourth,
11 Fifth, Seventh, Eighth, Fourteenth Amendments to the constitution. The Defendants cumulatively
12 have acted to deny the plaintiff equal protection under the law and commit the act of oppression
13 under the color of authority. The Courts and its officers have failed to follow the rules as set forth in
14 the Constitution, the Nevada Revised Statutes and the Federal Rules of Civil Procedure. This
15 barrage of constitutional violation and civil procedural violation have become a pattern of action
16 that would leave a reasonable man to be believe in a conspiratorial conduct to vex and harass the
17 plaintiff and deny him equal protection under the law.
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22 The Officers of the Court have entered into actions that, through their actions, have deprived the
23 Defendant of life liberty and property without the due process of law. The Marshal Service, and
24 specifically Eric Ramos, through their actions, caused the plaintiff physical harm. Marshal Eric
25 Ramos committed false arrest of the Plaintiff and also illegally transported the Plaintiff to the
26 Washoe County Jail. Personnel at said Jail called an ambulance and ordered the transportation of
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1 the Plaintiff to Renown Medical Center with an apparent heart attack that caused not only physical
2 and psychological damage but also financial harm. This financial harm is ongoing and will continue
3 as The Plaintiff has no insurance, is unemployed, has no means of paying such debt and will go to
4 collections and thus be harassed for payment that are due and payable by the City of Reno, as the
5 plaintiff was in custody at the time of the occurrence of said heart attack.
6

7 8 Jurisdiction

- 9
- 10 1. The Plaintiff being a resident of the State of Nevada is within the Jurisdiction of The US District
11 Court, District of Nevada.
 - 12 2. This Court enjoys subject matter jurisdiction over this action under 28 U.S.C. § 1332(a) (1)
13 because the amount in controversy exceeds \$75,000.
 - 14 3. This Court enjoys venue under 28 U.S.C. § 1391(a)(2) because all or a substantial portion of
15 the events that gave rise to Plaintiff's claims transpired in the State of Nevada, including the
16 publication or republication of the defamatory falsehoods and the damage to Plaintiff's reputation.
 - 17 4. This Court enjoys personal jurisdiction over the Defendants because the false and defamatory
18 statements made by Defendants were published in Nevada and available through out The United
19 States and the Plaintiff-target of the defamatory statements was and remains a resident of
20 Nevada.
 - 21 5. As one of the Named parties is in fact the Washoe County District Court in Reno Nevada and
22 award would come from the general fund of the Washoe County and thus the source of revenue for
23 court operations, thus litigation in this Washoe County District Court would be biased.
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6. Numerous causes of action are for the violation of constitutional rights so as to allow the jurisdiction of the United States District Court District of Nevada.

The Parties

7. The City of Reno being an employer of Defendants operating within their official capacity and being a municipality within the State of Nevada is within the Jurisdiction of The US District Court, District of Nevada.

8. The City of Sparks being an employer of Defendants operating within their official capacity and being a municipality within the State of Nevada is within the Jurisdiction of The US District Court, District of Nevada.

9. The County of Washoe being an employer of Defendants operating within their official capacity and being a municipality within the State of Nevada is within the Jurisdiction of The US District Court, District of Nevada.

10. Defendant Eric Ramos employed as a City Marshal within the City of Reno who acted on behalf of the City of Reno and violated laws and exceeded officially acceptable standards and allowing the civil actions, holding him personally liable.

11. City of Reno Marshal Commander Justin Roper in his official capacity for failure to supervise officers under his supervision or possible authorization of illegal acts by said officers.

12. Defendant yet unidentified officers employed as a police officer within the City of Sparks who acted on behalf of the City of Sparks and violated laws and exceeded his/hers officially acceptable standards and allowing the civil actions holding him personally liable.

1 13. Sparks police Chief Steve Keefer in his official capacity for failure to supervise officers under his
2 supervision or possible authorization of illegal acts by said officers.

3 14. Defendant Tamatha Schreinert employed as a Court Master in Reno District Court who acted
4 on behalf of Washoe County and violated laws and exceeded her officially acceptable standards
5 and allowing the civil actions holding her personally liable.

6 15. Defendant Sue Edmonson employed as a Court Master in Reno District Court, who acted on
7 behalf of Washoe County and violated laws and exceeded her officially acceptable standards and
8 allowing the civil actions holding her personally liable.

9 16. Defendant Justice Court Judge Patricia A. Lynch employed as a Judge in the City of Reno in
10 the County of Washoe and violated laws and exceeded her officially acceptable standards and
11 allowing the civil actions holding her personally liable.

12 17. Defendant Judge Kevin Higgins employed as a Judge in the City of Sparks in the County of
13 Washoe and violated laws and exceeded her officially acceptable standards and allowing the civil
14 actions holding him personally liable.

15 18. As a proximate result of the above-described actions, Plaintiff has suffered loss of his reputation,
16 shame, mortification, and mental distress all to his general damage in a sum to be proven at trial.

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21 **Cause of Action**

22 **First Cause of Action: Intentional infliction of emotional distress**

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24 19. Plaintiff refers and repleads each and every allegation contained in paragraphs 1 through 18 of this
25 verified complaint, and by reference incorporates the same herein and makes each a part thereof.
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1 20. The officers of the Court Master SUE EDMONDSON employed by Washoe County in The
2 District Court Family Court division issued a Temporary Restraining Order in the case CV11-00456
3 on the grounds as stated in a complaint filed by Tina Cline on the grounds of 6000 harassing text
4 messages, that even district Judge LINDA GARDNER realized were not credible and had no merit.
5 The Court issued this arbitrary and capricious order on these supposed 6000 harassing text
6 messages as being good and true evidence of harassment thus need for a restraining order. The
7 device that held these supposed harassing text messages was in the possession of the party in the
8 chambers and because of the Court Masters inability to comprehend an electronic phone and
9 inability to comprehend that text messages are a normal and intricate part of the everyday means
10 of conversation between parties both in and out of a relationship. The court used this ex-parte
11 conversation to issue a restraining order on the grounds of exigent circumstances when none
12 existed.
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16 21. Tamatha Schreinert's continuation of the damage to the defendant was exacerbated by
17 Tamatha Schreinert who was the presiding Master in CV11-00456 who issued a extension of said
18 restraining order for the period of one year for a relationship that was a total of 3 months and one
19 afternoon of a mutual argument that occurred between a couple engaged in a relationship.
20 Tamatha Schreinert caused long term financial and mental anguish to the defendant. The actions
21 of the court master were both arbitrary and capricious and were not within the legal practices a
22 determined by the Nevada Revised Statues with regards to the legal procedure with regards to a
23 civil case brought before the court.
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27 22. Justice Court Judge Patricia A. Lynch in Jamie Mercurio vs. Greg Hughes Patricia Lynch ruled
28 arbitrarily and capriciously granting a restraining order to Mercurio who claimed that the two had

1 sex and it was non consensual even though they were in a long term off again on again
2 relationship that was not in the jurisdiction of the court and should have been removed to Washoe
3 County District Court Family Court Division. The order Patricia Lynch issued in this mater she
4 issued an order that was arbitrary and capricious in nature and violated the plaintiffs' civil rights.
5 This order barred the plaintiff from attending any function on the campus of the University of
6 Nevada Reno including the funeral of Joe Crowley which caused the plaintiff extreme anguish. This
7 order also barred The Plaintiff from exercising his constitutional rights of freedom of speech and
8 freedom of political association.
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11 23. Judge Lynch again on the case of RCR2011-059718 allowed the arrest of the plaintiff by the
12 Marshal, who was under the direct control of the court, on fictitious grounds, causing the plaintiff to
13 suffer a heart attack. The Marshal then again tried to have the Plaintiff arrested on fictitious
14 grounds, which the judge signed and only rescinded this arrest warrant when the Plaintiff found out
15 that a warrant had been issued and tried to file a motion to stop said action. Judge Lynch then
16 ordered a hearing be held on an order to show cause. Hughes filed for a continuance and the
17 judge failed to act causing The Plaintiff to be forced to miss attend his mother-in-laws funeral in
18 Chicago. The Plaintiff now lives in fear as to the actions of this judge, and her henchmen in the
19 marshal's service, and their illegal and unethical acts.
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23 24. The City of Sparks had been involved in a pattern of actions that are both illegal and unethical.
24 Sparks Police Officers have left the legal confines of their jurisdiction and entered the city of Reno
25 for the purpose to harass, vex and commit the act of oppression under the color of authority. These
26 officers harassed the Plaintiff to the point that the Plaintiff had to install additional locking systems
27 on his office front door, instruct his employees that they were not to allow the Sparks Police on the
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1 premises. The Plaintiffs employees began to be apprehensive of attending work because of
2 harassment by Sparks Police officers. The Plaintiff was forced to file a complaint with the Sparks
3 Police Department internal affairs and the police chief in order to halt the harassment.

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5 25. The harassment of the Plaintiff continued as an unknown officer at Sparks Police department
6 began steering clients to Nicole Harvey Esq. who would then file actions against The Plaintiff. This
7 referral, or steering, of clients is in direct violation of Nevada State Law.

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9 26. The Plaintiff served a subpoena to have documents in the possession of Sparks police
10 Department disclosed to the Plaintiff. The Sparks Police, in order to protect its corrupt officers, filed
11 for, and was granted a protection order on the guise of an ongoing investigation, thus aiding Tina
12 Cline in civil litigation.

13
14 27. The officer at the Reno Marshal Service, specifically Eric Ramos, committed numerous
15 crimes including Oppression Under the Color of Authority, threats and intimidation. This officer was
16 under the direct supervision of City of Reno Marshal Commander Justin Roper in his official
17 capacity. Marshal Roper failed to supervise the personnel in his direct control.

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20 **Second cause of action: Defamation of character**

21 28. Plaintiff refers and repleads each and every allegation contained in paragraphs 1 through 27 of this
22 verified complaint, and by reference incorporates the same herein and makes each a part thereof.

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24 29. The defendants both jointly, and separately, caused items to be entered into the public record
25 that were defamatory to the personal and business reputation of the defendant.
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1 30. Marshal Eric Ramos paraded and abused the defendant in a public area to cause irreparable
2 harm to the defendant in his reputation and caused items to be entered into the public record that
3 defames the business and professional reputation of the defendant.
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5 **Third cause of action: FOR LIBEL**

6 31. Plaintiff refers and repleads each and every allegation contained in paragraphs 1 through 27 of this
7 verified complaint, and by reference incorporates the same herein and makes each a part thereof.
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10 32. The Plaintiffs jointly and individually have made statements, entered into the public record and
11 made available for public consumption, items and statements, which are libelous in nature and made
12 with malicious intent.
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14 **Forth Cause of action: FOR SLANDER PER SE**

15 33. Plaintiff refers and repleads each and every allegation contained in paragraphs 1 through 27 of this
16 verified complaint, and by reference incorporates the same herein and makes each a part thereof.
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19 34. The Plaintiffs jointly and individually have made statements, entered into the public record and
20 made available for public consumption, items and statements that are Slandorous in nature and made
21 with malicious intent
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23 **Fifth Cause of Action: Denial of Constitutional Rights**

24 35. Plaintiff refers and repleads each and every allegation contained in paragraphs 1 through 27 of this
25 verified complaint, and by reference incorporates the same herein and makes each a part thereof.
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1 36. The Plaintiffs jointly and individually have had abridged the constitutionally protected rights of the
2 defendant. The courts have acted in a manor that denied the Plaintiff the right to a fair trail and due
3 process of law.

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5 **Sixth Cause of action: False arrest**

6 37. Plaintiff refers and repleads each and every allegation contained in paragraphs 1 through 27 of this
7 verified complaint, and by reference incorporates the same herein and makes each a part thereof.
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10 38. The Defendants jointly and in conjunction with marshal committed the crime of false arrest without
11 a legally issued warrant by a court of jurisdiction, in violation of Nevada Revised Statuettes.

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13 39. Marshal Eric Ramos arbitrarily and capriciously with malicious intent falsely arrested the Plaintiff for
14 the purpose of committing the act of false arrest.
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16 **Seventh Cause of action: False imprisonment**

17 40. Plaintiff refers and repleads each and every allegation contained in paragraphs 1 through 27 of this
18 verified complaint, and by reference incorporates the same herein and makes each a part thereof.
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21 41. Marshal Eric Ramos with and in conjunction with other defendants committed the act of false
22 imprisonment with and in conjunction with other parties that conspired with said marshal to commit the
23 act of false arrest thus the act of false imprisonment by the act of baring the free movement of the
24 Plaintiff and placing the plaintiff in handcuffs and placing the plaintiff in custody without cause.
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26 **Eight cause of action: Extortion**
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1 42. Plaintiff refers and repleads each and every allegation contained in paragraphs 1 through 27 of this
2 verified complaint, and by reference incorporates the same herein and makes each a part thereof.

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4 43. Marshal Eric Ramos with, and in conjunction with, other defendants committed the act of false
5 imprisonment with and in conjunction with other parties that conspired with said marshal to commit the
6 act of false arrest thus the act of false imprisonment by the act of baring the free movement of the
7 Plaintiff and placing the plaintiff in handcuffs and placing the plaintiff in custody without cause. Said
8 marshal then offered to release the plaintiff from custody and transport said plaintiff to a local hospital
9 for the purpose of medical care for the apparent heart attack caused by the actions of Marshal Eric
10 Ramos. The Marshal also attempted extortion of a confession by the threat of incarceration without bail
11 of the Plaintiff for a period of up to three months if the Plaintiff defended his rights and insisted on a
12 court trail as to the validity of said charges. Said Marshal only stopped his extortion attempt when
13 personnel from the Washoe County Sheriffs Department intervened and called an ambulance and had
14 the plaintiff transported to medical facilities at Renown Medical Center.

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17 **Ninth cause of action: With holding of medical care of person in custody**

18 44. Plaintiff refers and repleads each and every allegation contained in paragraphs 1 through 27 of this
19 verified complaint, and by reference incorporates the same herein and makes each a part thereof.

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22 45. Marshal Eric Ramos personally and in conjunction with other defendants committed the act of false
23 imprisonment with and in conjunction with other parties that conspired with said marshal to commit the
24 act of false arrest thus the act of false imprisonment by the act of baring the free movement of the
25 Plaintiff and placing the plaintiff in handcuffs and placing the plaintiff in custody without cause. Said
26 marshal then offered to release the plaintiff from custody and transport said plaintiff to a local
27 hospital for the purpose of medical care for the Heart attack caused by the actions of Marshal Eric
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1 Ramos. The Marshal also attempted extortion of a confession by the threat of incarceration without bail
2 of the Plaintiff for a period of up to three months if the Plaintiff defended his rights and insisted on a
3 court trail as to the validity of said charges. Said Marshal Eric Ramos only stopped his extortion
4 attempt when personnel from the Washoe County Sheriffs Department intervened and called an
5 ambulance and had the plaintiff transported to medical facilities at Renown Medical Center.

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7 **Tenth Cause of action: Infliction of financial harm**

8 46. Plaintiff refers and repleads each and every allegation contained in paragraphs 1 through 27 of this
9 verified complaint, and by reference incorporates the same herein and makes each a part thereof.
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12 47. The Defendants jointly and individually caused the Plaintiff financial harm by their actions in
13 causing the closure oh his business Northwestern Bone & Tissue LLC. All parties acted as to make an
14 environment that was detrimental to the ability to Hughes to continue to perform his job as CEO/CFO of
15 Northwestern Bone & Tissue LLC thus causing the closure of said business and the forcing of Hughes
16 to fire all of the people who he had employed for several years.

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19 48. The Defendants jointly and individually caused the Plaintiff financial harm by their actions in the
20 publishing false detrimental statements and information that when held in conjunction cast such a false
21 light as to the nature of the plaintiff as to render him unemployable.

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24 **Eleventh Cause of Action: Casting a false light**

25 49. Plaintiff refers and repleads each and every allegation contained in paragraphs 1 through 27 of this
26 verified complaint, and by reference incorporates the same herein and makes each a part thereof.
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2 50. The defendants jointly and individually through their actions have caused the cumulative effect of
3 publishing and distributing information that cast the plaintiff in a false light causing emotional, physical
4 and psychological damage to the plaintiff.
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7 **Twelfth cause of action: Violation of first amendment rights**

8 51. Plaintiff refers and repleads each and every allegation contained in paragraphs 1 through 27 of this
9 verified complaint, and by reference incorporates the same herein and makes each a part thereof.

10 52. Judge Patricia Lynch in her actions issued an order barring the Plaintiff from any publishing of his
11 thoughts, opinions and political views on a web site, Craigslist.org, that is used as a forum for
12 discussion of numerous subjects including the lampooning of judges and political figures. This has
13 barred The Plaintiff from discussion and publication of his thoughts, opinions and political views in an
14 open forum for discussion amongst his friends and colleagues.
15

16 53. Judge Patricia Lynch in her actions issued an order barring the Plaintiff from being on the grounds
17 of University of Nevada, Reno for any reason at all. This included taking of any classes, attending
18 political and social functions on the grounds of the University of Nevada Reno. This has caused the
19 defendant to be unable to further his education in any way, or to be a part of any political meeting held
20 on the grounds.
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23 **Fourteenth cause of action: Violation of forth amendment rights**

24 54. Plaintiff refers and repleads each and every allegation contained in paragraphs 1 through 27 of this
25 verified complaint, and by reference incorporates the same herein and makes each a part thereof.

26 55. Judge Patricia Lynch in her actions issued warrants and actions that were arbitrary and capricious
27 in nature and in clear violation of the fourth amendment to the constitution.
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56. Marshal Eric Ramos had issued and preformed actions that were clear violation of the fourth amendment to the constitution.

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Fifteenth cause of action violation of Fifth Amendment rights

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57. Plaintiff refers and repleads each and every allegation contained in paragraphs 1 through 27 of this verified complaint, and by reference incorporates the same herein and makes each a part thereof.

58. Judge Patricia Lynch in her actions issued warrants and actions that were arbitrary and capricious in nature and in clear violation of the Fifth Amendment to the constitution.

59. Judge Sue Edmondson in her actions issued warrants and actions that were arbitrary and capricious in nature and in clear violation of the fourth amendment to the constitution.

60. Judge Tamantha Schreinert in her actions issued warrants and actions that were arbitrary and capricious in nature and in clear violation of the Fourth Amendment to the Constitution.

61. Judge Marshal Eric Ramos in his actions issued warrants and actions that were arbitrary and capricious in nature and in clear violation of the Fourth Amendment to the Constitution.

Sixteenth cause of action: Violation of Seventh Amendment Rights

62. Plaintiff refers and repleads each and every allegation contained in paragraphs 1 through 27 of this verified complaint, and by reference incorporates the same herein and makes each a part thereof.

63. Judge Patricia Lynch violated the rights granted under the 7th Amendment which guaranteed the Right for Civil Law Trials by Jury. It also guaranteed the right to an appeal to federal courts.

64. Judge Sue Edmondson violated the rights granted under the 7th Amendment which guaranteed the right for Civil Law Trials by Jury. It also guaranteed the right to an appeal to federal courts.

1 65. Judge Tamantha Schreinert violated the rights granted under the 7th Amendment which
2 guaranteed the right for Civil Law Trials by Jury. It also guaranteed the right to an appeal to federal
3 courts.
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6 **Sixteenth cause of action: Violation of Equal protection under the law**

7 66. Plaintiff refers and repleads each and every allegation contained in paragraphs 1 through 27 of this
8 verified complaint, and by reference incorporates the same herein and makes each a part thereof.
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10 67. The Plaintiff has been deprived by all parties, individually and in conjunction with others, to deprive
11 the plaintiff of rights guaranteed by the Constitution, as to equal protection under the law.

12 68. Judge Tamantha Schreinert in her actions as Court Master acted maliciously and with
13 calculated interest in depriving the plaintiff of the constitutionally guaranteed right to fair an
14 impartial hearing.
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16 69. Judge Tamantha Schreinert in her actions as Court Master held a trial in absentia in which she
17 heard testimony and used said testimony to reach a decision and find the plaintiff guilty of
18 contempt of court and thus deprive the Plaintiff of property.
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21 **Conclusion**

22 The cumulative effect of the actions of the defendants has caused the plaintiff's health to suffer,
23 both mental and physical, to diminish along with causing severe financial harm to the plaintiff and
24 his company Northwestern Bone and Tissue LLC and his former employees
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**PRAYER FOR RELIEF
FOR PLAINTIFF ON EACH RESPECTIVE CAUSE OF ACTION**

1. for general damages in a sum to be proven at the time of trial and within the jurisdictional limits of the United States District Court District of Nevada
2. For special damages in a sum to be proven at the time of trial and within the jurisdictional limits of the United States District Court District of Nevada
3. Punitive and exemplary damages from each Defendant, as allowed by law, in the sum to be proven at time of trial;
4. For cost of suit incurred herein; and,
5. Such other and further relief as the United States District Court District of Nevada deems just and proper.

Respectfully Submitted


Greg Hughes / Pro Per